

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson;  
JAMISON J., by and through his next friend, Clara Lewis;  
DESIREE, RENEE, TYSON, and MONIQUE P., by and through  
their next friend, Sylvia Forster; JOHN A., by and through his  
next friend, James D. Johnson; CODY B., by and through his  
next friend, Sharon Scott; MARY, TOM, MATTHEW, and  
DANA W., by and through their next friend, Zelatra W.; AND  
SAM H., by and through his next friend, Yvette Bullock; on their  
own behalf and behalf of all others similarly situated,

Plaintiffs.

CIVIL ACTION NO.  
3:04-CV-251-TSL-FKB

v.

PHIL BRYANT, as Governor of the State of Mississippi;  
DONALD TAYLOR, as Executive Director of the Department  
of Human Services; AND BILLY MANGOLD, as Director of  
the Division of Family and Children's Services,

Defendants.

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**AMENDED NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that counsel for plaintiffs will take the deposition upon oral examination of **David Chandler**, former Commissioner for the Mississippi Department of Child Protection Services, on Thursday, November 29, 2018, beginning at 11:00 a.m. at the law offices of Bradley Arant Boult Cummings, LLP, 188 East Capital Street, Suite 400, Jackson, Mississippi, 39201, by a court reporter duly authorized to administer oaths.

Plaintiffs request that deponent bring to said deposition all documents described in Exhibit A attached hereto.

RESPECTFULLY SUBMITTED, this, 14th day of November, 2018.

s/ Marcia Robinson Lowry  
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Erica A. Reed (*pro hac vice*)  
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*PLAINTIFFS' COUNSEL*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2018, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will deliver copies to all counsel of record

s/ Marcia Robinson Lowry  
Marcia Robinson Lowry (*pro hac vice*)

**EXHIBIT A**

Documents within your possession, custody, or control that were not previously produced and *that contain your handwritten notes* concerning any of the below-listed subject areas:

1. Budget requests submitted by Mississippi Department of Child Protection Services to the Mississippi Legislature for SFY 2019;
2. The SFY 2018 deficit;
3. The SFY 2019 deficit;
4. Efforts to secure additional funding for SFY 2019.